

PETER D. KEISLER
Assistant Attorney General
STEPHEN M. KETYER
Trial Attorney
Aviation & Admiralty Litigation
Torts Branch, Civil Division
U.S. Department of Justice
P.O. Box 14271
Washington, DC 20044-4271
Tel. (202) 616-4034
Fax (202) 616-4159

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X		
DEBRA CORRA and ANTHONY LAVIGNANI,	:	<u>NOTICE OF MOTION</u>
individually as Parents and Natural Guardians of	:	07 CV 4110 (LAK)
ANTHONY LAVIGNANI, an Infant,	:	
	:	IN ADMIRALTY
Plaintiffs,	:	
	:	
vs.	:	
	:	
UNITED STATES OF AMERICA,	:	
	:	
Defendant.	:	
-----X		

PLEASE TAKE NOTICE that, Defendant United States of America, by its undersigned counsel, will move this Court before the Honorable Lewis A. Kaplan, United States District Judge, United States Courthouse, 500 Pearl Street, New York, New York 10007, for an order transferring venue to the Middle District of Florida, pursuant to Rule 12(b)(3) of the Federal Rules of Civil Procedure, section 31104(a) of Title 46, United States Code, and section 1406(a) of Title 28, United States Code.

PLEASE TAKE FURTHER NOTICE that, by order of the Court, dated _____, 2007, Plaintiffs' opposition to Defendant United States' Motion is due on _____, 2007, and Defendants' reply is due on _____, 2007.

DATED: August 28, 2007
Washington, D.C.

Respectfully submitted,

PETER D. KEISLER
Assistant Attorney General

/s/ Stephen M. Ketyer
STEPHEN M. KETYER
Trial Attorney
Department of Justice
Civil Division, Torts Branch
Aviation/Admiralty Litigation
Post Office Box 14271
Washington, D.C. 20044-4271
(202) 616-4034
(202) 616-4159 (fax)
stephen.ketyer@usdoj.gov
Counsel for the United States of America

Of Counsel:

LCDR ROBERT A. WILLIAMS, JAGC
United States Navy
Office of the Judge Advocate General
Admiralty and Maritime Law (Code 11)
1322 Patterson Ave., Ste. 3000
Washington Navy Yard, DC 20374-5066
Telephone (202) 685-5157
robert.a.williams8@navy.mil